## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

JAMES WOODS, individually and as representatives of the class,

Plaintiff,

v.

Case No: 1:18-cv-00929-MHC The Honorable Mark H. Cohen

UBER TECHNOLOGIES, INC.,

Defendant.

## **CONSENT MOTION FOR EXTENSION OF TIME**

Plaintiff James Woods and Defendant Uber Technologies, Inc. in the above-captioned matter respectfully request the Court extend the time for Uber to file an Answer or otherwise respond to Plaintiff's Complaint. The Parties submit that there is good cause to extend the deadline to Answer or otherwise respond to Plaintiff's Complaint. Plaintiff's Complaint raises complex issues of fact and law, asserting six (6) causes of action and contains class action allegations. *See* Complaint (Doc. 1) at *passim*. Allowing Uber additional time to gather information and evaluate the case will serve the interests of this litigation and will not prejudice any party. The Parties have agreed to an extension of time for Uber to file an

Answer to Monday, April 30, 2018. In filing this Motion, no defense or objection is waived by Uber, and all of Uber's rights are reserved.

A proposed Order extending the time in which Uber may file its Answer or otherwise respond to the Complaint is attached hereto as **Exhibit A**.

Consented to and submitted this 22nd day of March, 2018.

### /s/ Archie Irwin Grubb, II

with express permission by T. Joshua R. Archer Archie Irwin Grubb, II

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# **CERTIFICATE OF SERVICE**

I hereby certify a copy of the foregoing has been served upon the following via the Court's CM/ECF system and U.S. Mail, properly addressed and postage prepaid, on this the 22nd day of March, 2018:

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